

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

Matthew J. Howard,  
Michelle R. Howard,

*Debtors.*

Case No. 23-13013-djb  
Chapter 13

**Motion to Approve Sale of Real Property**

Debtors Matthew J. Howard and Michelle R. Howard, through their attorney, hereby move this Court for the entry of an order approving the sale of real property, and in support thereof state as follows:

1. This case was filed under chapter 13 on October 5, 2023. A plan has been filed, but not yet confirmed.

2. The Debtors are the sole owners of real property located at 3124 Victoria Court in the Township of Bensalem, County of Bucks, and State of Pennsylvania (the “Property”).

3. The Debtors have received an offer from Amanda Bohn to purchase the Property for the sum of \$375,000, pursuant to a sale agreement dated April 9, 2025, which is attached as Exhibit A.

4. The sale is in the best interests of the bankruptcy estate and its creditors because it will provide for full payment of all timely-filed unsecured claims.

5. The Debtors seek approval to sell the Property under the terms of the sale agreement pursuant to 11 U.S.C. §§ 363 and 1303, and request that the fourteen-day stay under Fed. R. Bankr. P. 6004(h) be waived.

6. The Debtors also request approval to retain Equity Building Group as the listing broker, with a commission not exceeding six percent (4.5%) of the total sale

price, without the need for further application, notice, or hearing. The listing contract is attached as Exhibit B.

For those reasons, the Court must enter relief in the form of order attached, and further in the Debtors' favor if necessary and proper under the law.

Date: April 15, 2025

**SADEK LAW OFFICES, LLC**

By: /s/ Brad J. Sadek

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